



November 18, 2013

Attn: Paul Massera

California Water Plan Update 2013

California Department of Water Resources P.O.

Box 942836, Sacramento, CA 94236-0001

Re: Draft California Water Plan Update

Dear Mr. Massera:

Thank you for the opportunity to comment on the draft California Water Plan Update. The California Waterfowl Association is a statewide nonprofit organization whose principal objective is the conservation of the state's waterfowl, wetlands, and hunting heritage. CWA believes hunters have been the most important force in conserving waterfowl and wetlands.

CWA is particularly concerned about wetlands conservation and waterfowl habitat. The draft Update correctly notes that the state has lost approximately 90 percent of its historical wetlands (Objective 5 – Practice Environmental Stewardship, page 8-12). CWA is working to protect and manage what is left of the state's wetlands to maintain healthy populations of migratory waterfowl on the Pacific flyway. One of CWA's greatest challenges is ensuring an adequate water supply for waterfowl habitat.

CWA agrees with the Related Action 5.4 (Page 8-13), which calls for development and support of programs to pay private landowners and managers to protect and improve habitat and nature's water-related services. Among the included water-related services listed, Related Action 5.4 should include the provision of seasonal habitat for migrating waterfowl.

The draft Water Plan Update does not directly address the issue of providing a water supply for waterfowl habitat in the related actions to Objective 5. While many of the related actions may have the effect of providing water supply to waterfowl habitat if carried out, there is no specific mention of the state's obligations to provide water supply for refuges and other waterfowl habitat.

Specifically, two main issues affecting water supply for waterfowl involve the continuing water crisis in the Klamath Basin, and the state's obligations under the Central Valley Project Improvement Act (CVPIA) to provide Level 4 water to national wildlife refuges in the Central Valley. These issues must be addressed in the related actions to Objective 5.

The area of the Klamath National Wildlife Refuge Complex is the single most important staging area for waterfowl in all of North America. An estimated 80 percent of Pacific Flyway waterfowl, representing one-quarter of the population of ducks and geese on the North American continent, depend upon this region for fall and spring staging during their annual migrations.

The Klamath National Wildlife Refuge complex lacks a priority for water within the Klamath Basin and is the most likely user of water to be denied a water supply in dry years. In 2013, the Lower Klamath National Wildlife Refuge was deprived of a water supply from March through mid-September, leaving 20,000 acres of marsh to dry up completely. Crowding on the nearest available wetlands habitat at Tule Lake led to an outbreak of avian botulism that killed 8,000 birds.

CWA's board of directors has adopted a position of Support on the Klamath Basin Restoration Agreement, which is the only agreement that provides a source of water supply reliability for the National Wildlife Refuge complex. CWA recommends that a related action be added after Related Action 5.10 that reads as follows:

5.X In coordination with the U.S. Department of the Interior and other signatories to the Klamath Basin Restoration Agreement (KBRA), support the passage of legislation in Congress to implement the KBRA and provide a secure, stable water supply for the Klamath National Wildlife Refuge complex.

Another major concern of the California Waterfowl Association is the provision of Level 2 and Level 4 water under the Central Valley Project Improvement Act. While Level 2 water is provided in most years through the Central Valley Project, the full amount of Level 4 water is not. The draft Water Plan does not address the need to coordinate with the federal government and other agencies and nongovernmental organizations (NGOs) to secure reliable and affordable water for managed wetlands statewide. The draft Update also does not address the conveyance of Level 4 water to refuges and habitat areas that lack adequate conveyance facilities to use the water to which they are entitled. Providing the full amount of Level 4 water would be an enormous accomplishment for the state and federal governments on behalf of waterfowl. CWA recommends that a related action be added after Related Action 5.10 that reads as follows:

5.X Coordinate with the U.S. Department of the Interior, other agencies, and NGOs to meet the state's obligations to provide reliable and affordable water for managed wetlands statewide to meet the Level 4 water supply requirements of the CVPIA. Provide conveyance infrastructure for Level 4 water to refuges and habitat areas that lack adequate conveyance facilities to use the water to which they are entitled.

Thank you for considering the needs of California's waterfowl.

Sincerely,



Jeffrey A. Volberg  
Director of Water Law & Policy

